

MOSER LAW FIRM, PC



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June 9, 2021

VIA ECF

The Honorable A. Kathleen Tomlinson
United States Magistrate Judge
United States District Court
100 Federal Plaza
Central Islip, NY 117222

Re: *Caccavale v. Hewlett-Packard Company a/k/a HP Inc., et al.*
2:20-cv-00974-GRB-AKT (E.D.N.Y.)

Dear Judge Tomlinson:

This firm represents Plaintiffs Tony Caccavale, Anthony Mangelli, Douglas Sorbie and James Billups (collectively “Plaintiffs”) in the above referenced matter. This letter is submitted on behalf of all parties to request adjournments of the deadlines to meet and confer on any objections to the discovery demands, to seek Court intervention on any issues that cannot be resolved during a meet and confer, and to contact chambers to set up a phone conference regarding amending the pleadings in light of discovery.

Since the parties exchanged discovery responses on May 17, 2021, the parties have been working diligently to review same, to determine if there are any deficiencies, and to meet and confer to address any perceived deficiencies. Indeed, counsel for Plaintiffs and counsel for HP Inc., Hewlett-Packard Co. and Hewlett Packard Enterprise Co. have already met and conferred twice (on May 26, 2021 and June 3, 2021) and counsel for Plaintiff and counsel for Defendant Unisys have also already met and conferred twice (on May 27, 2021 and June 3, 2021). Counsel for all parties agree that the meet and confers have been productive in narrowing down the issues and seek to continue same so as to, *inter alia*, present as few potential issues to the Court for resolution as possible.

To that end, the parties jointly respectfully request that the below deadlines be extended as follows:

- (1) Deadline to meet and confer on objections to demands from June 2, 2021 to June 18, 2021;
- (2) Deadline to seek court intervention on objections not resolved by meet and confer from June 18, 2021 to July 9, 2021; and
- (3) Deadline to call chambers to set up a phone conference to seek to amend pleadings in light of discovery from July 2, 2021 until July 23, 2021.

The parties do not seek to modify any other case management deadlines at this time.

Thank you for your attention.

Respectfully submitted,

Paul Pagano

Paul A. Pagano

cc: All Counsel of Record (VIA ECF)